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U.S. Department of Justice

United States Attorney Southern District of New York

The Silvio J. Mollo Building One Saint Andrew's Plaza New York, New York 10007

September 23, 2020

BY ECF

The Honorable William H. Pauley III United States District Judge Daniel Patrick Moynihan United States Courthouse 500 Pearl Street New York, New York 10007

Re: United States v. Amilcar Romero et al., 19 Cr. 734 (WHP)

Dear Judge Pauley:

The Government writes on behalf of the parties in advance of the conference scheduled in this matter for September 30, 2020.

The parties have conferred and respectfully request that the Court adjourn the September 30, 2020 conference to November 5, 2020 before noon. As the Court knows, in recent weeks, three of the six defendants charged in Indictment 19 Cr. 734 have pleaded guilty. The Government is in discussions about pretrial resolutions with the three remaining defendants. The Government is hopeful that there will be at least some further pretrial resolutions before November 5, 2020. If there are not, the Government will likely ask the Court to set a trial date at the next conference.

Furthermore, the Government moves to exclude time under the Speedy Trial Act, pursuant to Title 18, United States Code, Section 3161(h)(1)(A), until November 5, 2020. The Government submits that the ends of justice served by such an exclusion outweigh the best interests of the defendants and the public in a speedy trial, because such an exclusion will allow the defendants to continue pursuing potential pretrial resolutions and otherwise to prepare for trial. In addition, such an exclusion will also ensure the effective assistance of counsel and prevent any miscarriage of justice. Defense counsel consent to this motion.

Application granted. Conference adjourned to November 5, 2020 at 10:00 a.m. Time excluded until November 5, 2020 in the interest of justice.

SO ORDERED:

By:

Michael D. Longyear

Respectfully submitted,

AUDREY STRAUSS

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Acting United States Attorney

U.S.D.J. September 25, 2020

WILLIAM H. PAULEY III